

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Case No.: 17-20518-GLT
)	
Kelly M. Haney)	Chapter 13
Debtor)	
)	Doc. No.:
Kelly M. Haney)	
Movant)	Hearing Date & Time: 10/28/20
)	
v.)	
)	
KR Enterprises, Inc. and)	
Ronda J. Winnecour, Trustee)	
Respondent)	

MOTION TO APPROVE SETTLEMENT

AND NOW comes the Debtor, Kelly M. Haney, by and through her attorney, Albert G. Reese, Jr., Esquire, and files the within Motion to Approve Settlement and in support thereof avers the following:

1. The Debtor filed a Voluntary Petition under Chapter 13 Bankruptcy Code on February 13, 2017.
2. Movant is the Debtor herein, an adult individual who resides at 7 Barton Drive, Pittsburgh, PA 15221.
3. On or about February 12, 2018, Debtor was involved in a post-petition injury while at work. See Exhibit A.
4. Debtor, Kelly M. Haney and KR Enterprises, Inc., have reached a settlement agreement in the amount of \$120,000.00 regarding this accident. See Exhibit B.
5. The settlement agreement intends to cover all known and unknown bodily injuries, as well as loss wages and future medical expenses as a result of the claim filed by Ms. Haney against KR Enterprises, Inc. See Exhibit B.
6. The settlement is conditioned upon obtaining Court approval of said agreement.
7. Debtor's Counsel for this matter, James C. Ward, has reduced the Attorney's Fees from 24% to 20% regarding this matter. See Exhibit B.

8. Counsel, Albert G. Reese Jr., seeks approval of the 20% Attorney's Fees for James C.

Ward, totaling \$20,000.00.

9. The Net Distribution/ Recovery to Debtor is anticipated to be \$60,920.00 for future indemnity for wages and \$39,080.00 for future medical expenses.

10. The net proceeds would be payable to the Debtor in accordance with Debtor's amended personal property and exemptions, which will be filed and made part of this motion.

11. The Debtor is satisfied with the settlement offer and believes that the approval of the proposed settlement is in the best interest of the Debtor in this case.

WHEREFORE, the Debtor, Kelly M. Haney, respectfully requests that this Honorable Court approve the Settlement Agreement between the Debtor and KR Enterprises, Inc.

Dated: **September 30, 2020**

Respectfully submitted by:
/s/ Albert G. Reese, Jr., Esq.
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